

Maureen R. Jeffreys
Maureen.Jeffreys@aporter.com
+1 202.942.6608
+1 202.942.5999 Fax
601 Massachusetts Ave., NW
Washington, DC 20001

December 8, 2015

VIA ECFS

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: *Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership for Consent To Transfer Control of Licenses and Authorizations, MB Docket No. 15-149*

Dear Ms. Dortch:

Pursuant to the Protective Order for this proceeding,¹ and the instructions set forth in the letter dated October 9, 2015 from William T. Lake, Chief of the Media Bureau of the Federal Communications Commission (the “Commission”), and the Request for Information and Data attached thereto (collectively, the “Request”),² AT&T Inc. (“AT&T”) is submitting the attached Second Supplemental Response to the Request.

Separately, AT&T is submitting a copy of this submission and unredacted exhibits to the Secretary’s office and copies of the submission and unredacted exhibits to the Commission Staff.

¹ *Applications of Charter Communications, Inc., Time Warner Cable Inc., and Advance/Newhouse Partnership for Consent To Transfer Control of Licenses and Authorizations*, MB Docket No. 15-149, Protective Order, FCC 15-110 (rel. Sept. 11, 2015).

² *Id.*, Letter from William T. Lake to Stacy Fuller, AT&T Services, Inc. (Oct. 9, 2015).

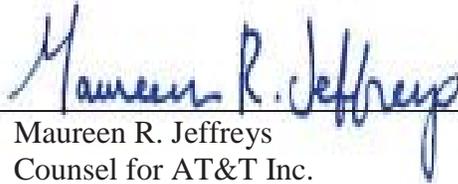
Marlene H. Dortch, Esq.

December 8, 2015

Page 2

Please contact me at (202) 942-6608 or Maureen.Jeffreys@aporter.com if you have any questions.

Respectfully submitted,


Maureen R. Jeffreys
Counsel for AT&T Inc.

Enclosure

**SECOND SUPPLEMENTAL RESPONSE OF AT&T INC. TO
REQUEST FOR INFORMATION AND DATA DATED OCTOBER 9, 2015**

December 8, 2015

AT&T's responses to the Request are as follows.

8. REQUEST:

For each zip code identified in Request 7(a) and for AT&T (excluding DIRECTV) as a whole, separately for residential subscribers, bulk residential, and non-residential subscribers, and for each month for the period beginning June 2012, through August 2015 in the states of California, Nevada, Hawaii and New York provide the following:

- a. AT&T's data as specified in AT&T Attachment B, which seeks subscriber data relating to each of the Company's service plans;**
- b. a complete description of all services that were included in AT&T's response to the "Marginal Recurring Revenue", "Recurring Core Service Plan Revenue", and "Recurring and Non-Recurring Revenue Per Subscriber" fields in the "Service Plan" table mentioned in subpart (a);**
- c. AT&T's data as specified in AT&T Attachment C, which seeks data relating to disconnects; and**
- d. a description of the main types of disconnects that are included in each of the four categories of disconnects - mover, voluntary, non-payment, and all other - reported in AT&T Attachment C, an explanation of the methodology AT&T uses to estimate the number of disconnects in each category including a discussion of the extent to which AT&T is unable to obtain information on the reason for the disconnect and how the disconnect is classified in such cases.**

RESPONSE:

Pursuant to discussions with the Commission staff, AT&T previously provided data in the same manner and subject to the same modifications as in AT&T's response to Requests 15 and 81(e) of the Information and Discovery Requests Dated September 9, 2014 in MB Docket No. 14-90¹ but

¹ *Applications of AT&T Inc. and DIRECTV for Consent To Assign or Transfer Control of Licenses and Authorizations*, MB Docket No. 14-90.

limited in geographic scope to California and Nevada.² Exhibit 8.1 comprised the data in response to Request 15 through July 2014 while Exhibits 8.3-8.4 comprised the data in response to Request 81(e) through July 2014. Today, AT&T is providing comparable data through August 2015. Exhibit 8.11 updates Exhibit 8.1 while Exhibits 8.13-8.14 update Exhibits 8.3-8.4, respectively.³ Consistent with the submission in MB Docket No. 14-90, these data do not include information for business subscribers, and AT&T relied on service-level subscriber billing information rather than line-item subscriber billing information in preparing Exhibits 8.11 and 8.14 and relied on line-item subscriber billing information for Exhibit 8.13. Some of the data are not maintained in the requested form in the ordinary course of AT&T's business and may be incomplete or contain inaccuracies.⁴ In addition to these general explanations and caveats, the detailed ones provided for Exhibits 8.1 and 8.3-8.4 also apply to Exhibits 8.11 and 8.13-8.14, respectively.⁵

² Hawaii and New York are outside of AT&T's ILEC wireline footprint. The response to Request 81.e was presented by zip code, so AT&T reproduced the rows for zip codes in California and Nevada. In contrast, the response to Request 15 was not geographically segregated, so AT&T recalculated the results after endeavoring to exclude data for customers outside California and Nevada.

³ Exhibits 8.12 and 8.15-8.18 contain notes, definitions, and other descriptions of the information in Exhibits 8.11 and 8.13-8.14, updating Exhibits 8.2 and 8.5-8.8, respectively.

⁴ At the time data were pulled to respond to this Request, complete data for August 2014 were no longer available for legacy TDM/DSL products in the active databases AT&T maintains in the ordinary course of business. Accordingly, for Exhibits 8.11, 8.14, and 8.19, data are presented beginning with September 2014, except that disconnect data are presented beginning with October 2014. (IP product data were available in those databases for August 2014. For Exhibit 8.13, therefore, data are presented beginning with August 2014, except that disconnect data are presented beginning with September 2014.) For data reported by tenure, we have assumed that customers subscribed to the same legacy TDM/DSL products in August 2014 that they did in September 2014.

⁵ See Response of AT&T Inc. to Request for Information and Data Dated October 9, 2015, at 8-11 (filed Oct. 30, 2015). In August 2015, AT&T began to offer "All In" television packages for those U-verse customers who want HD and up to three additional receivers included in the base price instead of as separate charges. Because each one of these packages otherwise is equivalent to a standard U-verse television package with the same number of channels, we are treating them as the same plan for purposes of this Response. Thus, the imputed values of HD and the additional receivers included in the base price for CLOCs with "All In" packages contribute to ARSPR (as presented in Exhibit 8.13) while separate charges for HD and equipment for CLOCs with standard U-verse television packages do not.

12. REQUEST:

For each zip code identified in Request 11(a) and for DIRECTV (excluding AT&T) as a whole, separately for residential subscribers, bulk residential, and non-residential subscribers, and for each month for the period beginning June 2012, through August 2015 in the states of California, Nevada, Hawaii and New York provide the following:

- a. **DIRECTV's data as specified in DIRECTV Attachment B, which seeks subscriber data relating to each of the Company's service plans;**
- b. **a complete description of all services that were included in DIRECTV's response to the "Marginal Recurring Revenue", "Recurring Core Service Plan Revenue", and "Recurring and Non-Recurring Revenue Per Subscriber" fields in the "Service Plan" table mentioned in subpart (a);**
- c. **DIRECTV's data as specified in DIRECTV Attachment C, which seeks data relating to disconnects; and**
- d. **a description of the main types of disconnects that are included in each of the four categories of disconnects - mover, voluntary, non-payment, and all other - reported in DIRECTV Attachment C, an explanation of the methodology DIRECTV uses to estimate the number of disconnects in each category including a discussion of the extent to which DIRECTV is unable to obtain information on the reason for the disconnect and how the disconnect is classified in such cases.**

RESPONSE:

Pursuant to discussions with the Commission staff, AT&T previously provided data in the same manner and subject to the same modifications as in DIRECTV's Schedule 14(a)-(d) and the plan data portion of DIRECTV's Schedule 58 in response to Requests 14 and 58 of the Information and Discovery Requests Dated September 9, 2014 in MB Docket No. 14-90.⁶ Exhibit 12.1 comprised the data from Schedule 14(a)-(d) through July 2014, and Exhibit 12.2 comprised the data from Schedule 58 through July 2014. Today, AT&T is providing comparable data through August 2015. Exhibit 12.3 updates Exhibit 12.1, using—as Exhibit 12.1 did—data from all customers in the United States. Exhibit 12.4 also updates Exhibit 12.1, but with data from customers in California,

⁶ *Applications of AT&T Inc. and DIRECTV for Consent To Assign or Transfer Control of Licenses and Authorizations*, MB Docket No. 14-90.

Hawaii, Nevada, and New York only.⁷ Exhibit 12.5 updates Exhibit 12.2 but is limited to zip codes in California, Hawaii, Nevada, and New York.

For Exhibits 12.3-12.5, AT&T has provided data that were maintained in the ordinary course of business. The data may contain inaccuracies that had not been corrected during the ordinary course of business. In some cases, data for specific time periods may be estimates where changes in data management systems made older data less reliable. In addition, where AT&T pulled data or information from different sources within the former DIRECTV for different requests, there may be minor discrepancies in the data. Consistent with the submission in MB Docket No. 14-90, these data do not include information for business subscribers. Consistent with the DIRECTV data provided in Exhibits 12.1-12.2, AT&T has defined “disconnects from the service plan” as subscribers who have disconnected from DIRECTV. Moreover, AT&T was not able to provide the subscriber acquisition cost for all of the subscribers on DIRECTV’s network.

⁷ Exhibits 12.3 and 12.4 are formatted slightly differently than Exhibit 12.1. Whereas Exhibit 12.1 contains a separate tab for each month of data, Exhibits 12.3 and 12.4 do not separate each month’s data into its own tab. Instead, they consolidate all months of data into one tab with an additional column indicating the applicable month.